

**Courtenay Wind Farm
Case No. PU-13-64**

EXHIBIT 16

At the public hearing on the Certificate of Site Compatibility application (“Application”) for the Courtenay Wind Farm (“Project”), held on July 12, 2013, Courtenay Wind Farm, LLC (“Courtenay”), testified that a portion of the architectural history investigation still needed to be completed for certain properties near the Project. Courtenay indicated that it would file a late-filed exhibit with updated architectural history investigation information.

The architectural history investigation has now been completed for all properties near the Project. An Updated Technical Memorandum – Class II Architectural History Investigation is attached as **Exhibit A**, which provides a complete discussion of the architectural history investigation completed for the Project. As discussed in the Updated Technical Memorandum, Courtenay’s environmental consultant identified three properties that it determined were eligible for listing on the National Register of Historic Places (“NRHP”). By letter dated August 22, 2013, the North Dakota State Historical Society, State Historic Preservation Office (“SHPO”) determined that, although eligible for listing on the NRHP, the Project will not adversely affect the three properties. A copy of the SHPO’s letter is provided with the Updated Technical Memorandum.

7630024_1.DOCX



October 18, 2013

Mr. Patrick Smith, Director of Environmental Planning
Geronimo Wind Energy
7650 Edinborough Way, Suite 725
Edina, Minnesota 55435

Subject: **Updated Technical Memorandum – Class II Architectural History Investigation**
Courtenay Wind Energy Project
Stutsman County, North Dakota

Dear Mr. Smith:

This updated technical memorandum supersedes the previous technical memorandum dated July 2, 2013 and presents the findings of a Class II Architectural History Investigation report dated August 2013 for the proposed 200 megawatt (MW) Courtenay Wind Energy Project (the Project) located 15 miles (mi) north of Jamestown in Stutsman County, North Dakota (see Figure 1). Work was performed by Stark Preservation Planning LLC (Stark) under contract to Tetra Tech on behalf of Geronimo Energy (Geronimo). The Project includes the construction of between 100 and 133 turbines (dependent upon final turbine model selected) and associated access roads, electrical collection system, permanent meteorological towers, and substation. The purpose of the architectural history investigation is to determine whether the Project area contains architectural history resources that may be eligible for listing on the National Register of Historic Places (NRHP).

FILE REVIEW

A Class I Cultural Resources Literature Search was conducted by Westwood Professional Services, Inc. (Westwood) at the North Dakota Heritage Center in October 2012. The results of this investigation were summarized in a Class I Cultural Resources Literature Search dated February 11, 2013.

SHPO CONSULTATION

On February 26 2013, Westwood received a response from Ms. Susan Quinnell, SHPO Review and Compliance Coordinator (ND SHPO REF: 13-0633), requesting:

- Agency consultation (Public Service Commission [PSC]);
- Consultation with tribal nations, North Dakota Indian Affairs, and the North Dakota Department of Transportation;
- Completion and submission of a Class II Reconnaissance Survey for standing structures in the Area of Potential Effects (APE) for visual effects;
- Completion and submission of a Class III Pedestrian Survey for all areas directly impacted by the project, including crane paths, service roads, transmission line, and turbine pads;



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- Inclusion of tribal monitors during the Class III Pedestrian Survey; and
- Completion of site forms.

On June 6, 2013 Tetra Tech sent a letter to Ms. Quinnell requesting comments on the size of the APE for visual effects for the Project. Tetra Tech also requested that the SHPO identify those properties (inventoried or un-inventoried) that should be included within the Class II Reconnaissance Survey.

On June 6, 2013, Tetra Tech received a response from Ms. Quinnell (ND SHPO REF: 13-0633) requesting a Class II Reconnaissance Survey for 26 locations, which included 33 properties or property groupings (e.g. farmstead), within a 1-mile radius of the proposed Project layout dated June 5, 2013. This will include photo-documenting the structures; confirming their presence/absence and determining if they are potentially over 50 years old. Ms. Quinnell indicated that site forms only needed to be filled out for potentially eligible structures/farmsteads. Copies of correspondence are attached.

FIELD SURVEY

Tetra Tech conducted the field survey between June 17 and 21, 2013. Photographs from public roads were taken of each property identified by SHPO. Photographs and photograph logs were provided to Stark, who evaluated the properties for initial NRHP eligibility. Following the preliminary field work, 28 of the properties were found to be not eligible for NRHP listing (Table 1). A Class II Architectural History Investigation was recommended for five properties:

- St. Mary's Cemetery – Wrought Iron Cross (TT06);
- Farmstead (TT11);
- Siebert Barn/Wanzek Farmstead (32SN769);
- John Neva School No. 2 (32SN718); and
- Kasper School No. 1 (32SN770).

Table 1. Initial NRHP Eligibility Evaluations of Properties in the APE

Field No.	Name	Recommendation
TT01	Abandoned farmstead remnants	Not eligible
TT02	Abandoned farmstead remnants	Not eligible
TT03	Farmstead	Not eligible
TT04	Siebert Barn/Wanzek Farmstead (32SN769)	Class II Architectural History Investigation recommended
TT05	Farmstead not extant	Not eligible
TT06	St. Mary's Cemetery – Wrought Iron Cross	Class II Architectural History Investigation recommended
TT07	Farmstead remnants	Not eligible
TT08	Farmstead not extant	Not eligible
TT09	Farmstead remnants	Not eligible
TT10	Farmstead remnants	Not eligible
TT11	Farmstead	Class II Architectural History Investigation recommended
TT12 15	Farmstead	Not eligible
TT13	Farmstead	Not eligible
TT14	Farmstead remnant	Not eligible
TT16	Farmstead	Not eligible
TT17	Farmstead	Not eligible
TT18	Farmstead	Not eligible
TT19	Kasper School No. 1 (32SN770)	Class II Architectural History Investigation recommended

Table 1. Initial NRHP Eligibility Evaluations of Properties in the APE

Field No.	Name	Recommendation
TT20	Farmstead	Not eligible
TT22	Cemetery	Not eligible
TT23	Farmstead remnant	Not eligible
TT24	Farmstead	Not eligible
TT25	Farmstead	Not eligible
TT26	Farmstead	Not eligible
TT27	Farmstead remnants	Not eligible
TT28	Farmstead	Not eligible
TT29	Farmstead	Not eligible
TT30	Farmstead	Not eligible
TT31	Farmstead	Not eligible
TT32	Farmstead remnant	Not eligible
TT33	Farmstead	Not eligible
TT34	Farmstead remnant	Not eligible
TT35	John Neva School No. 2 (32SN718)	Class II Architectural History Investigation recommended

A follow-up survey for the Class II Architectural History Investigation was completed on July 17-18, 2013 by Stark to document the five properties with potential eligibility for NRHP listing, as well as further investigation into several properties which could not be seen from public right-of-ways or were believed to have potential for listing.

SUMMARY OF CLASS II ARCHITECTURAL HISTORY INVESTIGATION FINDINGS

Of the five properties investigated in the Class II Architectural History Investigation, the St. Mary's Cemetery – Wrought Iron Cross (TT06) and the Farmstead (TT11) are not considered eligible for NRHP listing. However, three properties are recommended as eligible for NRHP listing:

- Siebert Barn/Wanzek Farmstead (32SN769)
- John Neva School No. 2 (32SN718)
- Kasper School No. 1 (32SN770)

Because principal views of the Siebert Barn (32SN769) and the John Neva School No. 2 (32SN718) do not include views of the proposed Project, Stark recommends a finding of no adverse effect. The Kasper School No. 1 (32SN770) is located within the wind farm and near several proposed turbines. Stark recommends that the proposed Project would diminish that historic property's integrity of setting, resulting in an adverse effect. Stark recommends consultation with the SHPO to address the elimination, minimization or mitigation of adverse effects. On August 16, 2013, these findings were submitted to the SHPO for review.

SHPO RESPONSE

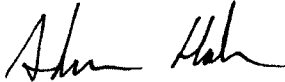
On August 22, 2013, the SHPO provided a response to the Class II Architectural History Investigation indicating a “*No Significant Sites Affected*” or “*No Adverse Effect*” determination. This determination conflicted with Stark's recommendations of an adverse effect for the Kasper School No. 1. On August 26, 2013, Tetra Tech contacted Ms. Quinnell to confirm the determination outlined in the SHPO's response letter dated August 22, 2013. Ms. Quinnell indicated that although the SHPO agrees that the three properties are eligible for listing on the NRHP, the SHPO does not agree with the finding of an

adverse effect for the Kasper School No. 1. Ms. Quinnell indicated that a “*No Significant Sites Affected*” or “*No Adverse Effect*” determination is appropriate for the Project.

If you should have any questions or comments concerning this submittal, please feel free to contact our office at (612) 643-2224 or kim.gorman@tetrattech.com.

Sincerely,

TETRA TECH



Adam C. Holven
Senior Archaeologist/Project Manager



Kimberely Gorman
Senior Project Manager

Attachments: Figure
Correspondence



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Director

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February 26, 2013

Mr. Dean T. Sather
Westwood Professional Services
7699 Anagram Drive
Eden Prairie, MN 55344

ND SHPO REF: 13-0633 PSC PU-13-64 Geronimo Wind Energy, Courtenay Wind Farm, LLC, 200.5 MW Wind Energy Conversion Facility 58 - 120 turbines Stutsman County, North Dakota


Dear Mr. Sather,

We reviewed your very preliminary information on ND SHPO REF: 13-0633 PSC PU-13-64 Geronimo Wind Energy, Courtenay Wind Farm, LLC, 200.5 MW Wind Energy Conversion Facility Stutsman County, North Dakota. There is potential for unrecorded and recorded cultural resource properties in a variety of physiographic settings in the overall project area. If the project requires permits issued by a federal and/or state agency (e.g., WAPA, RUS, COE, USFWS, BOR, PSC) then the respective agencies are to be consulted regarding their recommendations on the project. As a potential federal undertaking, we encourage early agency consultation as part of the review process. Early consultation should also include tribal nations, North Dakota Indian Affairs, ND DOT regarding any Scenic Byways, and managers or owners of properties maintained for recreational or scenic value.

We recommend a Class II (reconnaissance) survey by a permitted architectural historian for standing structures in the visual Area of Potential Effect (APE), and Class III survey of those found to be fifty years of age or older by a permitted architectural historian. Class III (pedestrian) surveys will be warranted for all areas directly impacted by the project, including crane paths, access roads, transmissions lines and turbine pads. We encourage you to invite tribal monitors to survey the APE. As part of the Class III Inventory, NDCRS site updates should be submitted on all sites resurveyed. If the project APE changes, we will request additional Class I (Cultural Resource Literature Search) inventories and consultation.

Thank you for the opportunity to review this project to date. We look forward to further review of cultural resource surveys and site forms, and updates as the project siting occurs. If you have any questions please contact Paul Picha, Chief Archaeologist (701) 328-3574 or Susan Quinnell, Review and Compliance Coordinator at (701) 328-3576, e-mail squinnell@nd.gov

Sincerely,


Merlan E. Paaverud, Jr.
State Historic Preservation Officer (North Dakota) and
Director, State Historical Society of North Dakota

C: Patrick Fahn, PSC

Holven, Adam

From: Holven, Adam
Sent: Thursday, June 06, 2013 8:40 AM
To: Quinnell, Susan L. [squinnell@nd.gov] (squinnell@nd.gov)
Subject: Request for Comment_Courtenay Wind Energy Center (ND SHPO REF: 13-0633)

Hi Susan,

Please find attached a request for comment letter and associated maps for the Courtenay Wind Energy Center (SHPO Ref.: 13-0633) in Stutsman County. Typically, I would mail this into the SHPO, but we are under a little time crunch and I hope emailing you this letter is alright. I can also send a hard copy if you would like to see that as well. We would like to you to review the maps and determine which properties the SHPO would like to see in the Class II report.

I believe we looked at all the properties present on the topo map within 1-mile of the proposed turbines for the [REDACTED] [REDACTED] that I am also working on and we were hoping to do something similar with this project. We were hoping you good provide the SHPO's comments by early next week; we need to get the field work started ASAP so we can have draft results and recommendations for a PSC hearing on July 2.

Thank you very much and please let me know if you have any questions,
Adam

Adam C. Holven | Senior Archaeologist/Project Manager
Direct: 612.643.2237 | Main: 612.643.2200 | Fax: 612.643.2201
adam.holven@tetrattech.com

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TETRA TECH

June 6, 2013

Susan Quinnell
Review and Compliance Coordinator
North Dakota State Historic Preservation Office
612 East Boulevard Drive
Bismarck, North Dakota 58505

Subject: Request for Comment on the Area of Potential Effects for Visual Effects for the Courtenay Wind Energy Center (ND SHPO REF: 13-0633), Stutsman County, North Dakota.

Dear Ms. Quinnell:

On February 26, 2013, Courtenay Wind Farm, LLC received a letter from the State Historical Society of North Dakota (SHSND) indicating the agency's review of the Class I Cultural Resource Inventory (ND SHPO REF: 13-0633). In this letter, SHSND recommended the completion of a Class II Reconnaissance Survey for standing structures and a Class III Pedestrian Survey for areas to be directly impacted by the project. Tetra Tech will conduct a Class III Pedestrian Survey in June 2013.

In regards to the Class II Reconnaissance Survey for standing structures, Tetra Tech requests the SHPO's comments on the size of the area of potential effects (APE) for visual effects for the Courtenay Wind Energy Center. Tetra Tech also requests that the SHPO identify those properties (inventoried or un-inventoried) that should be included within the Class II Reconnaissance Survey. Tetra Tech has provided three maps (hard copy and electronic copy) of the proposed turbine layout dated June 5, 2013.

Please feel free to contact me by telephone (612-643-2237) or by email (adam.holven@tetrattech.com) if you have any questions concerning this request.

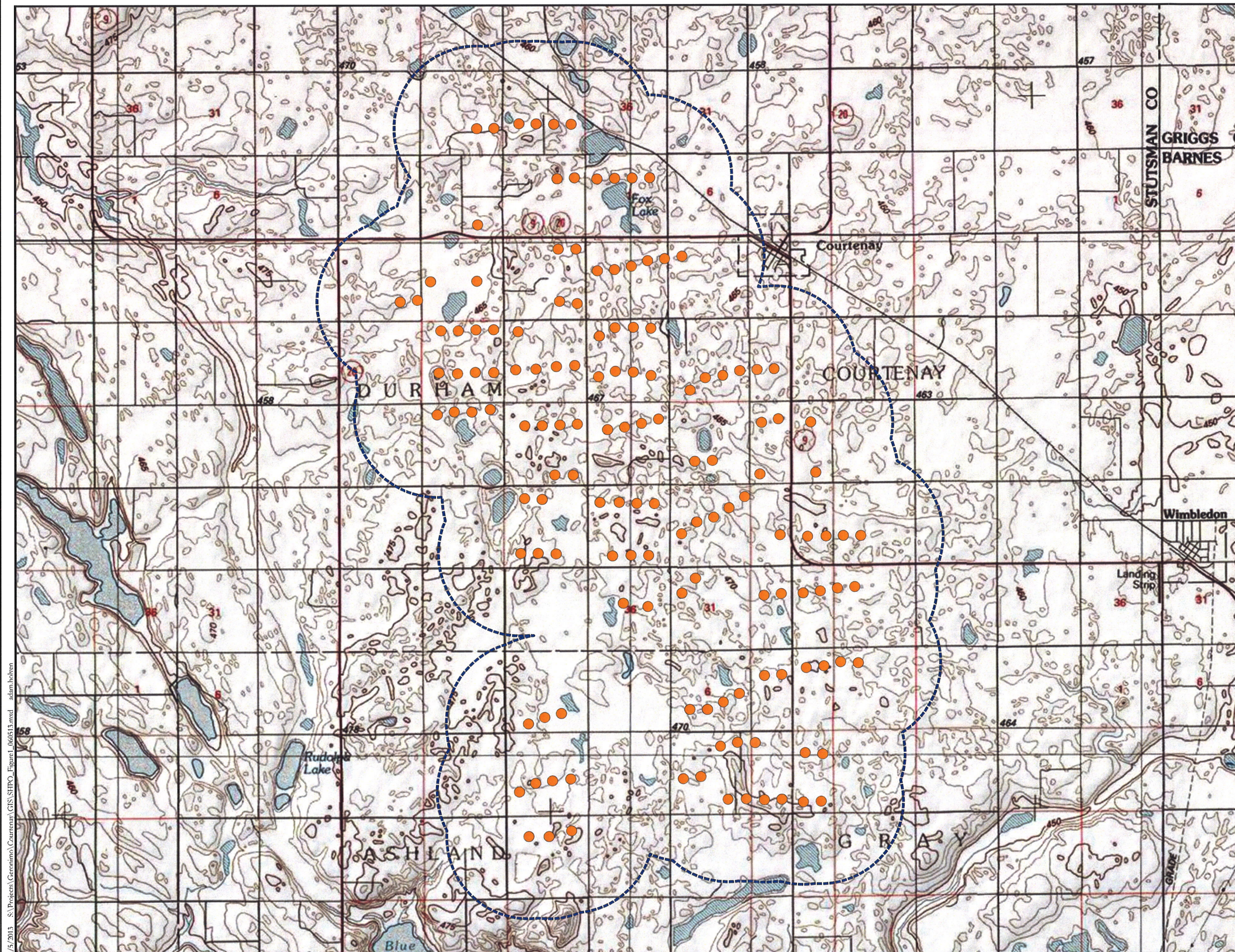
Sincerely,

Adam Holven
Senior Archaeologist/Project Manager

Enclosures

cc:

Mr. Patrick Smith, Geronimo Energy
Ms. Kimberly Gorman, Tetra Tech



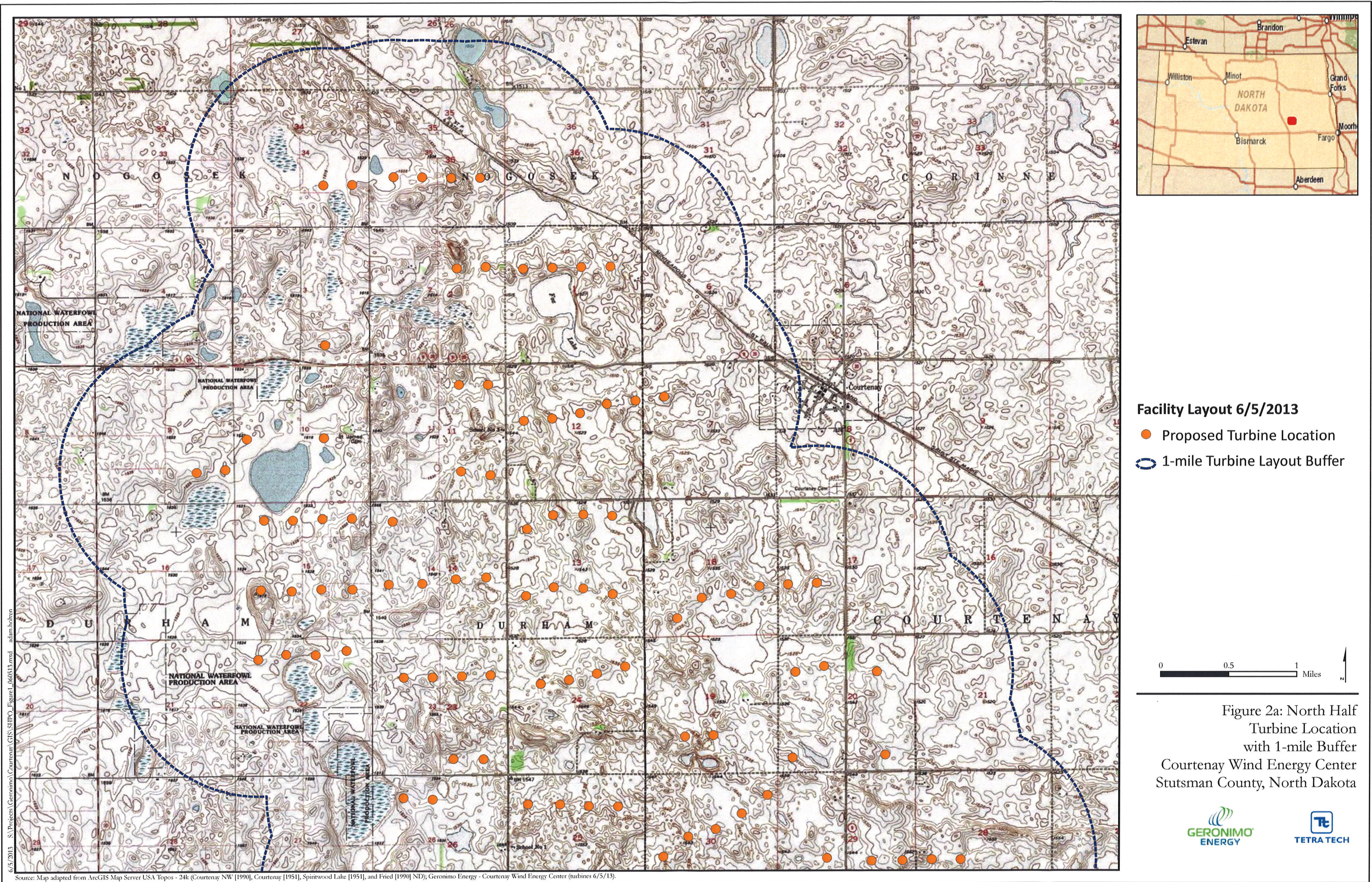
Facility Layout 6/5/2013

- Proposed Turbine Location
- 1-mile Turbine Layout Buffer



Figure 1:
Turbine Location
with 1-mile Buffer
Courtenay Wind Energy Center
Stutsman County, North Dakota







Holven, Adam

From: Quinnell, Susan L. <squinnell@nd.gov>
Sent: Thursday, June 06, 2013 2:39 PM
To: Holven, Adam
Subject: RE: Request for Comment_Courtenay Wind Energy Center (ND SHPO REF: 13-0633)
Attachments: doc07603420130606144412.pdf; doc07603020130606144213.pdf

Hi Adam,

Here are your maps back. I count 11 in the bottom half and 15 in the top half that you should drive by and provide photographs/ Just do site forms if something looks eligible.

Susan Quinnell
Review and Compliance Coordinator
ND State Historic Preservation Office
State Historical Society of North Dakota
North Dakota Heritage Center
612 East Boulevard Avenue
Bismarck ND 58505-0830

701-328-3576
701-328-3710 FAX

From: Holven, Adam [<mailto:adam.holven@tetrattech.com>]
Sent: Thursday, June 06, 2013 8:51 AM
To: Quinnell, Susan L.
Subject: RE: Request for Comment_Courtenay Wind Energy Center (ND SHPO REF: 13-0633)

Sorry

From: Quinnell, Susan L. [<mailto:squinnell@nd.gov>]
Sent: Thursday, June 06, 2013 8:50 AM
To: Holven, Adam
Subject: RE: Request for Comment_Courtenay Wind Energy Center (ND SHPO REF: 13-0633)

Hi Adam, I'd be happy to look at this, but there are no attachments.

Susan Quinnell
Review and Compliance Coordinator
ND State Historic Preservation Office
State Historical Society of North Dakota
North Dakota Heritage Center
612 East Boulevard Avenue
Bismarck ND 58505-0830

701-328-3576
701-328-3710 FAX



August 16, 2013

Mr. Merl Paaverud, North Dakota State Historic Preservation Officer
State Historical Society of North Dakota
North Dakota Heritage Center
612 East Boulevard Avenue
Bismarck, ND 58505-0830

**Subject: Class II Cultural Resource Inventory
Geronimo Wind Energy Center, Stutsman County
North Dakota Public Services Commission (PSC) Case No. PU-13-064**

Dear Mr. Paaverud:

On behalf of Geronimo Energy, Tetra Tech is pleased to submit the results of the Class II Architectural History Investigation for the Courtenay Wind Energy Center in Stutsman County (PSC Case No. PU-13-064). Due to the size the Project, a Certificate of Site Compatibility from the North Dakota Public Service Commission (PSC) is required; therefore, the Project is subject to review by the State Historical Society of North Dakota (SHSND) under the North Dakota Century Code 55-02-07. This document does contain detailed site location information and at this time only a summary was submitted to PSC.

We would appreciate a response within 30 days of receipt of this letter indicating whether the project will affect resources under your jurisdiction. Once Tetra Tech has received a response from the SHSND, this response will be forwarded to the PSC.

Your time and effort regarding this request are greatly appreciated. If you have any questions, please contact me at 612-643-2237.

Sincerely,

Adam Holven
Senior Archaeologist/Project Manager
adam.holven@tetrattech.com

Enclosures



**STATE
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August 22, 2013

Mr. Adam Holven
Senior Archaeologist/Project Manager
Tetra Tech
2001 Killebrew Drive, Suite 141
Bloomington, MN 55425

NDSHPO REF.: 13-0633 PSC Geronimo Wind Energy Center, "Courtenay Wind Energy Project Class II Architectural History Investigation, Stutsman County, North Dakota"

We have reviewed correspondence and project document for NDSHPO REF.: 13-0633 PSC Geronimo Wind Energy Center, "Courtenay Wind Energy Project Class II Architectural History Investigation, Stutsman County, North Dakota" by William E. Stark (Stark Preservation Planning, August 2013) and find it acceptable.

If consulted by a state or federal agency, we would concur with "*No Significant Sites Affected*" or "*No Adverse Effect*" determinations provided the project is of the nature stated and it takes place in the location plotted and described in the project documentation.

Thank you for the opportunity to review this project. If you have questions please contact either Paul Picha at ppicha@nd.gov or (701) 328-3574 or Susan Quinnell at squinnell@nd.gov or (701) 328-3576.

Sincerely,

Merlan E. Paaverud, Jr.
State Historic Preservation Officer (North Dakota)
and
Director, State Historical Society of North Dakota

Gorman, Kim

From: Quinnell, Susan L. <squinnell@nd.gov>
Sent: Tuesday, August 27, 2013 8:21 AM
To: Gorman, Kim
Cc: Will Stark; Holven, Adam
Subject: RE: NDSHPO REF 13-0633 - Courtenay Wind Energy Project - Class II Architectural History Investigation

Yes, Kim that is correct. I'm adding this e-mail to the file.

Susan Quinnell
Review and Compliance Coordinator
ND State Historic Preservation Office
State Historical Society of North Dakota
North Dakota Heritage Center
612 East Boulevard Avenue
Bismarck ND 58505-0830

701-328-3576
701-328-3710 FAX

From: Gorman, Kim [<mailto:Kim.Gorman@tetrattech.com>]
Sent: Monday, August 26, 2013 4:03 PM
To: Quinnell, Susan L.
Cc: Will Stark; Holven, Adam
Subject: NDSHPO REF 13-0633 - Courtenay Wind Energy Project - Class II Architectural History Investigation

Susan,

We have received the ND SHPO response letter for the above mentioned Project which indicates that the ND SHPO concurs with the "No Significant Sites Affected" or "No Adverse Effect" determination for architectural resources. The Class II report completed by Stark identified three properties as eligible for NRHP listing:

- Siebert Barn/Wanzek Farmstead (32 SN 769)
- John Neva School No. 2 (32 SN 718)
- Kasper School No. 1 (32 SN 770)

Because principal views of the Siebert Barn (32 SN 769) and the John Neva School No. 2 (32 SN 718) do not include views of the proposed Project, Stark recommended a finding of no adverse effect. The Kasper School No. 1 (32 SN 770) is located within the wind farm and near several proposed turbines. Stark recommended that the proposed Project would diminish that historic property's integrity of setting, resulting in an adverse effect.

Per our telephone conversation, the ND SHPO agrees these three properties are eligible for NRHP listing and a "No Significant Sites Affected" or "No Adverse Effect" determination is appropriate for the Project (no adverse effect to the Kasper School No. 1).

Could you confirm I have this stated correctly?

Thank you in advance for your assistance!

Kind regards,

Kimberely

Kimberely Gorman, GISP | Senior Project Manager - GIS Specialist
Direct: 612.643.2224 | Main: 612.643.2200 | Fax: 612.643.2201
kim.gorman@tetrattech.com

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